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HAROLD BAER
U.S. DISTRICT JUDGE
S.D.N.Y.

Ethan E. Litwin

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April 10, 2008

BY HAND AND FAX (212) 805-7901

The Honorable Harold Baer, Jr.
Daniel Patrick Moynihan
United States Courthouse
500 Pearl St., Room 2230
New York, NY 10007

Re: *Diario El Pais, S.L., et al., v. The Nielsen Company (US), Inc.*
Index No. 07 Civ. 11295 (HB) (GWG)

Dear Judge Baer:

Section 4 of the Proposed Pretrial Scheduling Order ("Order") entered on March 28, 2008 in the above-referenced action requires the parties, if applicable, to submit to the Court any decisions reached relating to the handling of electronic discovery within 10 days of the signing of the Order. The parties have conferred on electronic discovery and have agreed, given the timetable and 60-day stay of discovery, to enter into a stipulation on electronic discovery. We expect to file the stipulation with the Court closer to the start of discovery.

Respectfully submitted,

Ethan E. Litwin

cc: Leslie G. Fagan, Esq.
Aidan Synnott, Esq.
William Taylor, Esq.

*This is a manager then planned
but because of the stay I will
allow the later time in all
but your see best in all
inclusion & need no problems
that need time to address.*

ORDERED:

AMSTERDAM BRUSSELS CHICAGO EAST PALO ALTO HOUSTON IRVINE LONDON LOS ANGELES
MUNICH NEW YORK NORTHERN VIRGINIA PARIS SALT LAKE CITY SAN FRANCISCO WASHINGTON, DC

Harold Baer, U.S.D.J.

Date: 4/10/08

Endorsement:

This is longer than planned but because of the story I will allow the extra time - but your stipulation best be all inclusive and raise no problems that will take time to address.